

1                                   **IN THE UNITED STATES DISTRICT COURT**  
2                                   **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

3  
4       People of the State of California, et al.

5                   v.

6       Meta Platforms, Inc., Instagram, LLC, Meta  
7       Payments, Inc., Meta Platforms Technologies, LLC  
8       -----

9       Office of the Attorney General, State of Florida,  
10      Department of Legal Affairs

11                  v.

12      Meta Platforms, Inc., Instagram, LLC., Meta  
13      Payments, Inc.  
14      -----

15      State of Montana, ex rel. Austin Knudsen, Attorney  
16      General

17                  v.

18      Meta Platforms, Inc., Instagram, LLC, Facebook  
19      Holdings, LLC, Facebook Operations, LLC, Meta  
20      Payments, Inc., Meta Platforms Technologies, LLC,  
21      Siculus, Inc.  
22      -----

23      **IN RE: SOCIAL MEDIA ADOLESCENT**  
24      **ADDICTION/PERSONAL INJURY PRODUCTS**  
25      **LIABILITY LITIGATION**

26      **THIS DOCUMENT RELATES TO:**

27      4:23-cv-05448; 4:23-cv-05885; 4:24-cv-00805

MDL No. 3047

Case No.: 4:23-cv-05448-YGR  
            4:23-cv-05885-YGR  
            4:24-cv-00805-YGR

**[PROPOSED] ORDER ADDRESSING  
LITIGATION HOLD NOTICES, SEARCH  
TERMS, AND CUSTODIANS IN CASES  
BROUGHT BY STATE ATTORNEYS  
GENERAL**

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

28               On October 15, 2024, the State Attorneys General Plaintiffs (the “State AGs”) and Defendants  
Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC  
 (“Meta”) submitted a Joint Letter Brief setting forth their positions on disputes concerning litigation hold  
 notices, search terms, and custodians. ECF No. 1217. On October 24, 2024, during a Discovery  
 Management Conference (“DMC”), the Court heard oral argument on the issues outlined in the Parties’  
 Joint Letter Brief.

1 Having reviewed the Joint Letter Brief and having heard the arguments of the Parties, and as stated  
2 on the record during the DMC, the Court **ORDERS** as follows:

3 1. Each State AG shall provide Meta with a weekly update including litigation hold  
4 information for all recipients at state agencies. Such information shall include the names, titles,  
5 and agency affiliations of all state agency personnel from the state agencies for which the Court  
6 held the State AG has legal control over the agency's documents in ECF No. 1117 who have  
7 received litigation holds in connection with this litigation, and the date on which the hold notice  
8 was first provided to each individual. If any State AG cannot provide such information, that State  
9 AG shall so state in the weekly report.

10 2. By November 1, 2024, each State AG for Arizona, California, Colorado, Delaware,  
11 Illinois, Kentucky, Maryland, Michigan, Minnesota, Missouri, New York, Oregon, Pennsylvania,  
12 and Rhode Island shall provide to Meta a proposed list of state agency custodians likely to possess  
13 information relevant to this litigation or responsive to Meta's discovery requests served on the  
14 State AGs, along with a proposed set of search terms to be used to locate such responsive  
15 documents. If any of these State AGs cannot provide such proposed state agency custodian or  
16 search terms for any of the state agencies for which the Court held the State AG has legal control  
17 over the agency's documents in ECF No. 1117, that State AG shall so state by November 1, 2024.

18 3. During the week of November 4 through 8, 2024, the State AGs for Arizona,  
19 California, Colorado, Delaware, Illinois, Kentucky, Maryland, Michigan, Minnesota, Missouri,  
20 New York, Oregon, Pennsylvania, and Rhode Island and Meta shall meet and confer regarding  
21 proposed search terms and proposed custodians. These State AGs shall undertake reasonable  
22 efforts to ensure that all necessary decision makers are on each such call, to facilitate efficient  
23 meet-and-confer efforts. And Meta shall make its counsel available in a timely manner. Any  
24 disputes regarding proposed search terms and custodians that remain unresolved may be addressed  
25 through letter briefing pursuant to the Court's dispute resolution procedure and raised at the next  
26 DMC.

**IT IS SO ORDERED.**

Dated: October \_\_\_\_, 2024

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MAGISTRATE JUDGE PETER H. KANG